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Fort Worth, TX 76102

Long B. Nguyen
Director, Process Safety & Environmental Programs

April 25, 2022

Director, Air Enforcement Division
U.S. Environmental Protection Agency
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1200 Pennsylvania Ave. NW Washington,
D.C. 20460

Director of Litigation
Litigation Division
MC-175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Director
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1201 Elm Street
Dallas, TX 75270

Division Chief
Environmental Protection Division
MC-066
Office of the Attorney General of Texas
P.O. Box 12548
Austin, TX 78711-2548

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611

**Re: Malfunction Event Notice
Tokai Carbon CB Borger Plant**

Dear Sir/Madame:

Per Provision 54 of the Consent Decree, Tokai Carbon CB hereby provides notice that the Borger Plant Wet Gas Acid ("WSA") scrubber had elevated SO₂ and NO_x emissions relative to their most stringent 7-day limits, for the period of March 10th through April 24th, 2022. (Please see attached CEMS data).

We are continuing to trouble-shoot the process with the vendors to determine why the WSA scrubber is not performing at an optimum level. At this point, we are focusing on the inline duct burner as a possible main cause for the elevated SO₂ and NO_x emissions.

The purpose of the inline duct burner is to heat the flue gas from 515 °F to 750 °F. The elevated temperature is needed as the flue gas enters the WSA scrubber. A trial has been planned for May 2022 to use a temporary, external heating source, instead of the inline duct

burner, to increase the flue gas temperature. If this trial is successful, then we will proceed with a permanent engineering solution that will be implemented as quickly as possible.

Specifically for the elevated NO_x emissions, we also have contacted the SCR vendor, Cormetech, to evaluate the operation parameters of the ammonia injection system and the SCR reactor. Based on an assessment of the process data that we have provided to the vendor, the vendor believes that catalyst fouling may have occurred. A shutdown of the WSA scrubber is planned so that an inspection can be performed and if required, we will perform the necessary cleaning of the catalyst surface. Additionally, we are evaluating the ammonia injection equipment to ensure adequate flow of the ammonia into the SCR.

For the elevated SO₂ emissions, we are also working with the WSA vendor, Haldor-Topsoe, to identify the root-cause for the WSA catalyst's performance. The vendor suspects that poor combustion from the upstream tail gas fired boilers and the natural gas fired duct-burner may negatively impact the WSA performance. A shutdown is planned to inspect the equipment, repairs be made if needed, so that the combustion of the equipment can be optimized.

As we have requested in the past, we would like to implement the alternative limits that are outlined in Provision 18 (Option B and Appendix E) and Provision 27.b.ii. These provisions allow for the collection of emissions data for a certain period, and alternative limits can be set based on the data collected.

Please let me know if you need additional information.

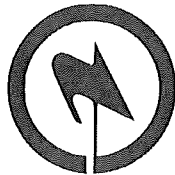
Sincerely,

A handwritten signature in black ink, appearing to read 'Long B. Nguyen', with a stylized flourish at the end.

Long B. Nguyen

SO2 7-Day ppmvdc Excess Emission Report Boiler (EPN-119)

From: 03/01/2022 00:00 To: 04/25/2022 05:58 Facility Name: Tokai Borger Facility
Generated: 04/25/2022 06:53 Location: Borger, TX



Tag Name: U1_SO2_7D_Ppmvdc_1D

Total Operating Time: 53.00 Day(s)

No Exclusions Allowed

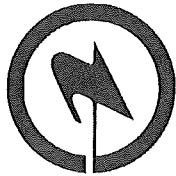
Non-Operating Time: 3.00 Day(s) Report Time: 56.00 Day(s)

Inc No	Start Time	End Time	Duration in Day(s)	Average	Limit	Maximum	Reason Code	Action Code
1	03/01/22 00:00	03/03/22 23:59	3	143	120	146		
2	03/12/22 00:00	04/08/22 23:59	28	166	120	204		
3	04/11/22 00:00	04/24/22 23:59	14	168	120	173		

Total Operating Time: 53.00 Day(s)
Total Duration (Online only): 45.00 Day(s)
Time in exceedance as a percentage of operating time: 84.91 %
Time in compliance as a percentage of operating time: 15.09 %

NOx 7-Day ppmvdc Excess Emission Report Boiler (EPN-119)

From: 03/01/2022 00:00 To: 04/25/2022 05:58 Facility Name: Tokai Borger Facility
Generated: 04/25/2022 06:52 Location: Borger, TX



Tag Name: U1_NOX_7D_Ppmvdc_1D

Total Operating Time: 53.00 Day(s)

No Exclusions Allowed

Non-Operating Time: 3.00 Day(s) Report Time: 56.00 Day(s)

Inc No	Start Time	End Time	Duration in Day(s)	Average	Limit	Maximum	Reason Code	Action Code
1	03/10/22 00:00	03/12/22 23:59	3	56	54	57		
2	04/11/22 00:00	04/24/22 23:59	14	81	54	87		

Total Operating Time:53.00 Day(s)
Total Duration (Online only):17.00 Day(s)
Time in exceedance as a percentage of operating time:32.08 %
Time in compliance as a percentage of operating time:67.92 %